

# PUBLIC SUBMISSION

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**Docket:** NRC-2017-0213

Renewal of information collections in 10 CFR Part 54, Requirements for Renewal of Operating Licenses for Nuclear Power Plants

**Comment On:** NRC-2017-0213-0002

Information Collection: Requirements for Renewal of Operating Licenses for Nuclear Power Plants

**Document:** NRC-2017-0213-DRAFT-0003

Comment on FR Doc # 2018-07729

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## Submitter Information

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## General Comment

1. Is the proposed collection of information necessary for the NRC to properly perform its functions? Does the information have practical utility?

Yes and Yes

2. Is the estimate of the burden of the information collection accurate?

The numbers for recordkeeping are about right, maybe even a little high since it is mostly automated.

If that is the case, do not count the effort to actually perform the inspections but merely to document for auditing purposes.

In that case 20,000 hours seems very high since no more than 2000 hours would be expected to be used after the inspections are done.

3. Is there a way to enhance the quality, utility, and clarity of the information to be collected?

No comment.

4. How can the burden of the information collection on respondents be minimized, including the use of automated collection techniques or other forms of information technology?

Vendors have been used to upload documents since the NRC doesn't accept USB drives.

It may be easier to load all documents on a USB drive and mail it to the NRC.

Uploading a large number of documents at one time can be troublesome.